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March 24, 1998

RECEIVED

Mr. Richard Metzger, Chief
Common Carrier Bureau
Federal Communications Commission
Washington, DC 20554

MAR 24 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: MCI ex parte letter of March 17, 1998 in CC Docket No. 92-237/(CIC Conversion)

Dear Mr. Metzger:

GTE provides the following comments concerning the MCI letter of March 17, 1998 to the Chief of the Common Carrier Bureau in the above captioned matter.

MCI has identified several reasons why it believes the permissive dialing period should be extended. GTE does not believe that an extension is warranted given the effort which has been made to meet the Commission's requirements, but it has no objection to a short extension in order for the IXCs to be ready for an end to permissive dialing.

MCI characterized GTE's letter of March 3, 1998 as violative of the Reconsideration Order. Even VarTech's reply (attached) calls it an improper and illegal attempt to require conversion before June 30, 1998. Both have misunderstood the intent of the GTE letter. It was an attempt to be sure that carriers make their trunking conversions *before* July 1, 1998 and to offer any assistance with a coordinated planning effort to convert from 3 to 4 digit CICs that are passed from the LEC to the carrier and comply with the FCC mandate that the use of 3 digit CICs (5 digit CACs) will *end* on June 30, 1998. Conversion to a 7 digit CAC should not interfere with the permissive use of the 5 digit CAC by the calling party. GTE is concerned that VarTech indicates it does not plan to convert its trunks until after June 30, 1998, clearly not what the Commission intended when it specified a transition period with permissive dialing during the first six months of 1998. GTE's switches already accept both the 3 and 4 digit CICs (5 and 7 digit CACs). Many of the interexchange carriers have not yet transitioned their 3 digit CICs to the 4 digit CIC format.

MCI also expresses concern about the standard Intercept message approved by the NIIF. GTE notes that the standard intercept message language was adopted by the NIIF representing all industry interests, not just LECs. MCI participated in adoption of this industry standard message although it offered an alternative message. GTE also proposed an alternative message. Both of us were turned down by the Forum. GTE supports the use of industry fora such as the NIIF to reach a consensus to best serve all aspects of the industry and, although GTE didn't get the exact wording it desired, it acceded to the majority decision. GTE is working at fever pitch to convert the intercept messages in more than 1600 switches in compliance with the Commission's Order. Programming of our switches with the standard intercept message has been underway since approval by the NIIF in February. The standard intercept message should not now be changed as it will cause considerable time and expense to have to reprogram and install a new message at this point throughout GTE's network. Other LECs no doubt would face the same situation. The key to customer understanding of the shift to the 7 digit CACs must come from education efforts by the IXCs, not reliance on a recorded intercept message.

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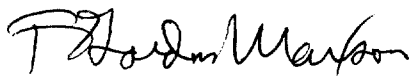
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As to the question of implementation of the blocking of the 5 digit CACs, it is quite apparent that blocking on a flash cut basis is literally not possible. There was also confusion about whether blocking should begin or be complete by June 30, 1998. In an effort to answer this question, BellSouth sought a clarification. GTE believes that a common starting date for implementation would be the best approach. Otherwise, the differing implementation periods would cause havoc with public understanding of the meaning of a permissive dialing period. If some LECs begin to block during the permissive dialing period, then it really is not permissive. Moreover, in markets where more than one local carrier has a presence (such as the Los Angeles area), if GTE were to begin blocking on a date different than PacBell, the interexchange carriers' customers would be very confused. It was also clear from our investigation that different LECs would require different transition period for implementation. All of us want to implement the blocking as quickly as resources permit, and GTE can assure you that there is no intent to pursue this leisurely. Notification of the transition period should be made through the Network Change Notification process. In fact, GTE had sent letters to all carriers last Monday advising that the permissive dialing period would end on June 30.

BellSouth subsequently filed a Request for a Ruling which the Bureau could address expeditiously and resolve the confusion. GTE supports that effort and urges the Bureau to make the necessary clarifications as soon as practicable.

Two copies of this notice are filed in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Very truly yours,



F. Gordon Maxson
Director - Regulatory Affairs

Attachment

C: Geri Matise
Kris Monteith
Dave Ward
ITS



March 9, 1998

Mr. Bob Yeaw
GTE
One Tampa Center
201 N. Franklin Street
PO Box 110
Tampa, FL 33601-0110

Dear Bob:

This letter is in response to your letter dated March 3, 1998. VarTec believes that it is improper and illegal for GTE to require IXCs to convert to a 7 digit access code prior to the end of the FCC mandated transition period. It is VarTec's position that all end users be able to access our 5 digit code through June 30, 1998.

VarTec will utilize GTE's method of conversion; however, we will not convert our trunks until after 6/30/98.

Thank you for your assistance with this matter. Should you have any questions, please do not hesitate to call me at 972-274-7796.

Sincerely,


Christin McConnell

VarTec Telecom, Inc.
3320 W. Pleasure Run Road
Lanham, Texas 75146
(972) 250-7300
FAX: (972) 250-7301

NETWORK CHANGE SHORT TERM NOTIFICATION

GTE Network Services

Public Notice of Network Change under Rule 51.333

March 16, 1998

Subject: End of Permissive Dialing for Five Digit CACs

Implementation: June 30, 1998

Location of Change: All equal access exchanges served by GTE

Description: Consistent with the FCC's Order on Reconsideration in CC Docket No. 92-237, the permissive dialing period for five-digit Carrier Access Codes (CACs), (i.e., 10-XXX), will come to an end on June 30, 1998. After that date, customers wishing to have their toll calls carried by an Interexchange Carrier (IXC) other than that to which they are pre-subscribed, must dial the new, seven-digit (101-XXXX) CAC.

All equal access local switches currently recognize both three-digit and four-digit Carrier Identification Codes (CICs) allowing both five-digit and seven-digit Carrier Access Code (CAC) dialing. As noted above, this permissive dialing, in which both five-digit and seven-digit CACs are accepted, will end on June 30, 1998.

Impact: Beginning June 30, 1998, customers must dial a seven-digit CAC (i.e., 101-XXXX) in order to reach a non-presubscribed IXC. Therefore, customers that dial a five-digit CAC (i.e., 10-XXX) will be forwarded to an industry standard intercept announcement, which informs them that their call cannot be completed as dialed, and provides new dialing instructions.

Participating carriers are encouraged to provide timely notification to these dialing plan changes to their customers (end-users). Some products and services that utilize CACs may need to be reprogrammed from 10-XXX to 101-XXXX.

Reference: FCC Order on Reconsideration, CC Docket No. 92-237, released October 22, 1997.

Internet website: www.fcc.gov/Bureaus/Common_Carrier/Orders/1977/index6.html

Contact person:

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